

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

_____ X

SHAMOLI KAPOOR

Plaintiff,

Affirmation of Service

-against-

MICHAEL MATTHEWS JEWELERS OF KINGS
PLAZA, LLC, et al,

1:22 CV 05027-HG (TAM)

Defendant.

_____ X

I, Jesse David Eisenberg, declare under penalty of perjury that I have
served a copy of the attached Letter to Michael Matthew's Jewelers of Kings Plaza LLC

upon MICHAEL MATTHEWS JEWELERS OF KINGS PLAZA, LLC

whose address is: 5391 Kings Plaza, Brooklyn, New York 11234

Dated: 2/18/25

Staten Island, New York

Jesse Eisenberg
Signature

15 Emerald Court
Address

Staten Island, NY
City, State, Zip Code



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February 18, 2025

Michael Matthew's Jewelers of Kings Plaza LLC
5391 Kings Plaza
Brooklyn, NY 11234

Re: Shamoli Kapoor v. Michael Matthew's Jewelers of Kings Plaza LLC, et al.

To whom it may concern:

Please be advised I represent Plaintiff Shamoli Kapoor ("My Client"). My Client was sent this by the Court and ordered to provide a copy to you: "ORDER: The proposed discovery schedule 97 is granted, in part, on consent, in light of the change of counsel and the underlying state court actions that may impact the disposition of this case. The deadline for the completion of fact discovery is **5/30/2025**, and the deadline to file a joint status report on ECF certifying the close of fact discovery is **6/27/2025**. In the letter certifying the close of fact discovery, the parties may request an expert discovery schedule and include proposed dates. The deadline to initiate any dispositive motions in accordance with the Individual Rules of the assigned District Judge is **7/11/2025**. In the absence of any dispositive motion practice, the parties are directed to file a Joint Pre-Trial Order by **8/22/2025**. **Given the age of this case and procedural history, counsel is advised that the Court is unlikely to look favorably upon additional requests for an extension absent unforeseen, extraordinary circumstances.**



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The Court notes that Mr. Eisenberg has indicated that he will not represent Defendant Michael Matthews Jewelers of Kings Plaza, LLC. The Corporate Defendant is respectfully reminded that '[a] party that is a corporation must be represented by counsel in order to appear in this Court.' See

https://www.ca2.uscourts.gov/clerk/case_filing/appealing_a_case/civil_case/representation_of_a_corporation.html, 28 U.S.C. § 1654; *Berrios v. New York City Housing Authority*, 564 F.3d 130, 132-133 (2d Cir. 2009). Failure to have counsel appear for the corporate Defendant may result in the corporate Defendant being found to be in default. Counsel for Defendants is respectfully directed to provide a copy of this order to Defendant Michael Matthews Jewelers of Kings Plaza, LLC, and to file proof of same on ECF by **1/30/2025**.

The Clerk of Court is respectfully directed to terminate Bhavleen Sabharwal as counsel of record for Defendants. Ordered by Magistrate Judge Taryn A. Merkl on 1/23/2025. (KKS) (Entered: 01/23/2025)"

Sincerely,

/s/ Jesse David Eisenberg
Jesse David Eisenberg, Esq.
Attorney for Stephen Nicosia
JDE Law Firm, PLLC
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Staten Island, New York 10314
718.966.0887